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November 20, 2015

**VIA ELECTRONIC FILING**

Hon. Carla E. Craig, Chief U.S.B.J.  
United States Bankruptcy Court  
Eastern District of New York  
Conrad B. Duberstein Courthouse  
271-C Cadman Plaza East  
Suite 1595  
Brooklyn, New York 11201

**Re: Citibank, N.A. v. Bombshell Taxi LLC et al**  
**Case No. 1-15-01185-cec**

Dear Judge Craig:

As Your Honor is aware, we represent Evgeny Freidman in connection with the above-referenced action. We write to request that the Court issue an Order allowing Mr. Freidman to take discovery in advance of the upcoming hearing regarding Citibank N.A.'s ("Citibank") efforts to obtain a pre-judgment Order of Attachment on November 30, 2015. Specifically, Mr. Freidman seeks to take the deposition of a corporate representative of Citibank to learn, *inter alia*, when and how Citibank first became aware that Mr. Freidman lawfully transferred assets to grantor trusts. This speaks directly to Citibank's allegations of fraud. Substantial pre-hearing discovery is underway by Citibank, and fundamental fairness and due process require that Mr. Freidman be afforded an equal right to such discovery.

Mr. Freidman's counsel has asked Citibank's counsel to produce a corporate representative of Citibank for a deposition in advance of the November 30, 2015 hearing, as the existing Order of the Court allowing pre-hearing discovery does not preclude Mr. Freidman from taking such discovery. Notwithstanding Mr. Freidman's counsel's highly relevant and reasonable request, Citibank has indicated that it refuses to allow Mr. Freidman to engage in any pre-hearing discovery whatsoever. Citibank's counsel appears to believe that the Court's Order allowing pre-hearing discovery is a one-way street, permitting only Citibank to conduct pre-hearing discovery and not Mr. Freidman.

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If Mr. Freidman is not afforded the opportunity to conduct any pre-hearing discovery, as Citibank suggests, Mr. Freidman shall be deprived of basic due process rights and will effectively be denied a meaningful opportunity to present all facts necessary to defend against Citibank's misguided allegations that he engaged in the fraudulent secretion of assets.

Accordingly, Mr. Freidman respectfully requests that the Court issue an Order definitively clarifying its prior Order, and requiring a Citibank representative with knowledge of the matters at issue in this proceeding to appear for a deposition on or before Tuesday, November 24, 2015.

As always, we thank the Court for its consideration of this matter and for the opportunity to bring these issues to the attention of the Court. Should the Court require anything further, please do not hesitate to have Your Honor's chambers contact the undersigned directly.

Respectfully submitted,

/s/ Matthew S. Adams  
Matthew S. Adams

MSA:jk

cc: Counsel of Record (*via ECF*)